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VIA HAND AND ELECTRONIC DELIVERY

January 30, 2007

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: Notice of Ex Parte Presentation, CC Docket No. 96-115**  
**Telecommunications Carriers' Use of Customer Proprietary**  
**Network Information and Other Customer Information**

Dear Ms. Dortch:

On January 29, 2007, the Anti-Pretexting Working Group ("Group")<sup>1</sup> met with Commissioner Deborah Tate, Ian Dillner, Legal Advisor to Commissioner Tate, and John Hunter, Chief of Staff and Senior Legal Advisor, Wireline Issues to Commissioner Robert McDowell. The Group includes a broad spectrum of ILECs, Wireless Carriers, Cable Operators and a major CLEC ("service providers").

In today's meeting, the Group emphasized that its members are seriously concerned that they would be unable to adhere to an immediate compliance deadline for the Customer Proprietary Network Information ("CPNI") rules that the Commission is likely to adopt in this proceeding. Specifically, the member companies described the amount of time necessary for front-end and back-end software development, software testing, customer service training, and providing customer notification of changes regarding accounts.

In addition, the Group described serious operational hurdles associated with implementing opt-in consent for disclosure of CPNI to joint venture partners and/or independent contractors for marketing purposes.

<sup>1</sup> The Anti-Pretexting Working Group was represented by Jim Halpert and Heidi Salow, DLA Piper US LLP, counsel to the Working Group. Among the participating companies, the following companies were present at the meeting: Donna Epps, Verizon; Anisa Latif, AT&T; Steven Teplitz, Time Warner; and Mary McManus, Comcast.



Consistent with the Commission's Ex Parte rules, please associate this letter, which is being filed electronically, with the above-captioned docket. Please contact one of the undersigned if you have any questions related to this filing.

Sincerely,

Heidi Salow  
Jim Halpert  
Counsel to the Anti-Pretexting Working  
Group

cc: Ian Dillner  
John Hunter

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